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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ADIDAS AMERICA, INC., a Delaware
corporation; and **ADIDAS AG**, a foreign entity,

Plaintiffs,

v.

COUGAR SPORT, INC., a New York
corporation,

Defendant.

Case No. 3:15-cv-01856-SI

Defendant Cougar Sport, Inc.'s
UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE
RESPOND TO SECOND AMENDED
COMPLAINT

RULE 7-1(a) CERTIFICATE OF COMPLIANCE

Pursuant to LR 7-1(a), counsel for defendant Cougar Sport, Inc. ("Cougar Sport") certifies that her co-counsel conferred in good faith with counsel for plaintiffs adidas America,

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OTHERWISE RESPOND TO SECOND AMENDED COMPLAINT

Inc., and adidas AG ("plaintiffs") concerning this request for extension of time and plaintiffs agree to the extension requested herein.

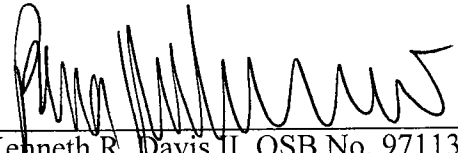
MOTION

Cougar Sport respectfully requests that the Court issue an order extending its time to answer or otherwise respond to plaintiffs' Second Amended Complaint to May 23, 2016. This extension of time is requested due to the new facts, assertions and issues raised in the Second Amended Complaint, the expected substitution of new counsel in place of defendant's lead counsel Amster, Rothstein & Ebenstein, and because the parties have been focusing their attention on attempting to resolve the case.

Following an unopposed motion for leave (ECF Nos. 50-51), the Second Amended Complaint was filed on April 13, 2016. (ECF No. 52.) The current deadline for Cougar Sport's responsive pleading is May 2, 2016. The reason for this request is to allow Cougar Sport sufficient time to complete its investigation into plaintiffs' allegations, and to prepare its response to the Second Amended Complaint. No other deadlines will be impacted by this extension. This motion is made with good cause and not for purposes of delay.

DATED: April 29, 2016

LANE POWELL PC

By 
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